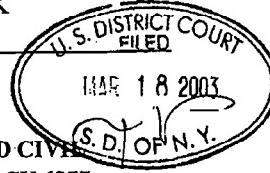


## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

KATHLEEN ASHTON,	)	
et. al.,	)	
	Plaintiffs,	)
v.	)	
	ACTION NO. 02 CV 6977	
AL-QAEDA ISLAMIC ARMY,	)	
et. al.,	)	
	Judge Allen G. Schwartz	
	Defendants.)	



ORDER ON PLAINTIFFS' REQUEST  
FOR SERVICE BY MAIL TO  
LAST KNOWN READILY ASCERTAINABLE ADDRESS  
AND BY PUBLICATION PURSUANT TO Fed. R. Civ. P. 4(f)(3)

Plaintiffs, by their attorneys and consolidated liaison counsel Kreindler & Kreindler, having filed their Motion for Service by Mail and Publication, and the Court, having considered the Memorandum and Points and Authorities and oral argument, NOW FINDS that Plaintiffs' proposed means of service is reasonably calculated to notify the Defendants of the lawsuit and afford them an opportunity to present their objections.

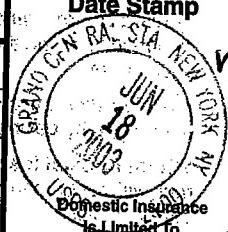
*g/w*  
*ny lush*  
*-900 AM*  
Having reviewed the case law and the facts alleged in the Consolidated Master Complaint, the Court will permit service of the Master Complaint to be made by mailing a copy of the summons and complaint (translated into Arabic and Farsi) and other specified appropriate languages, to the last known address if readily ascertainable and by publication; Iraq, Iran and Sudan to be served pursuant Fed. R. Civ. P. 4(j) and 28 U.S.C. § 1608. Plaintiffs may serve Defendants by publishing the attached notice for six weeks in English, Arabic, Farsi, Pashtu and Urdu, in the respective publications of *Al-Hayat*; *Al Quds Al Arabi*; *Al-Ahram*; *Pakistan Daily Jang*; *Ettela'at*; *The Philippine Star National*; *International Herald Tribune*, and placing the Notice on the World Wide Web at <http://www.sept11terrorlitigation.com>.

ACCORDINGLY it is ORDERED this 18<sup>th</sup> day of March, 2003.

Allen G. Schwartz  
United States District Judge for the Southern  
District of New York

MAR 19 2003

## **EXHIBIT B**

Registered No. <b>R A 618 672 167 US</b>		Date Stamp
To Be Completed By Post Office  Reg. Fee \$ <b>7.50</b> Handling \$ <b>1.75</b> Postage <b>27.70</b> Received by <b>MN</b>		 Domestic Insurance Is Limited To <b>\$25,000; International Indemnity Is Limited (See Reverse)</b>
Special Delivery Return Receipt Restricted Delivery  Customer Must Declare Full Value \$ <b>0</b> <input type="checkbox"/> With Postal Insurance <input checked="" type="checkbox"/> Without Postal Insurance		
To Be Completed By Customer (Please Print) All Entries Must Be In Ballpoint or Typed		<b>KTM</b> <b>KREINDLER &amp; KREINDLER</b> <b>100 Park Avenue</b> <b>New York, N.Y. 10017</b>
FROM  TO		<b>YASIN AL-QADI a/k/a YASSIN AL-KADI</b> <b>P.O. Box 214</b> <b>JEDDAH, SAUDI ARABIA 21411</b>
PS Form 3806, Receipt for Registered Mail (Customer Copy) June 2000 <small>(See Information on Reverse)</small>		

Item Description	Registered Letter	United States Mail	Other (Indicate)	Small Mail
Nature of Service	Delivery to Person	Delivery to Address	Delivery to Business	Delivery to Post Office
Value	Insured Value	Insured Value (Value Declared)	Amount Number	RA 618 672 167
Insured Value	Value Declared	Value Declared	Amount Number	RA 618 672 167
Office of Mailing (Post office deposit)	Delivery Point	Delivery Point	Delivery Point	Delivery Point
Address Name of Firm (Nom du destinataire) (Address Name of Firm (Nom du destinataire))				
<b>YASIN AL-QADI a/k/a YASSIN AL-KADI</b>				
Street and No. (Rue et numero)				
<b>P.O. Box 214</b>				
Place and Country (Localite et pays)				
<b>JEDDAH, SAUDI ARABIA 21411</b>				
The recipient (destinataire) of the addresser (expediteur) has acknowledged receipt of this document. It is understood that the addressee (destinataire) has been informed of the contents of this document and that he (she) has agreed to be bound thereby. If the addressee (destinataire) is a corporation, it is understood that the addressee (destinataire) is a representative of the corporation who has signed below. If the addressee (destinataire) is a government agency, it is understood that the addressee (destinataire) is a representative of the agency who has signed below.				
I, the addressee (destinataire), acknowledge receipt of the above document. I understand that the contents of this document are binding upon me (nous).				
Signature of Addressee (Signature de l'expediteur) (Signature of Addressee (Signature de l'expediteur))				
				

## **EXHIBIT C**

**FROM THE OFFICE OF PUBLIC AFFAIRS**

October 12, 2001  
PO-689

**TREASURY DEPARTMENT RELEASES LIST OF 39 ADDITIONAL SPECIALLY DESIGNATED GLOBAL TERRORISTS**

Treasury Office of Foreign Asset Control (OFAC) has added the names of 39 terrorists to its list of Specially Designated Global Terrorists (SDGT). Their assets must be blocked immediately.

ABDULLAH, Abdullah Ahmed (a.k.a. ABU MARIAM; a.k.a. AL-MASRI, Abu Mohamed; a.k.a. SALEH), Afghanistan (DOB 1963; POB Egypt; citizen Egypt) (individual) [SDGT]

AGHA, Haji Abdul Manan (a.k.a. SAIYID, Abd Al-Man'am), Pakistan (individual) [SDGT]

AL-HAMATI SWEETS BAKERIES, Al-Mukallah, Hadhramawt Governorate, Yemen [SDGT]

AL-HAMATI, Muhammad (a.k.a. AL-AHDAL, Mohammad Hamdi Sadiq; a.k.a. AL-MAKKI, Abu Asim), Yemen (individual) [SDGT]

AL-HAQ, Amin (a.k.a. AH HAQ, Dr. Amin; a.k.a. AMIN, Muhammad; a.k.a. UL-HAQ, Dr. Amin) (DOB 1960; POB Nangahar Province, Afghanistan) (individual) [SDGT]

AL-JADAWI, Saqr (DOB 1965) (individual) [SDGT]

AL-KADR, Ahmad Sa'id (a.k.a. AL-KANADI, Abu Abd Al-Rahman) (DOB 01 Mar 1948; POB Cairo, Egypt) (individual) [SDGT]

AL-LIBY, Anas (a.k.a. AL-LIBI, Anas; a.k.a. AL-RAGHIE, Nazih; a.k.a. AL-RAGHIE, Nazih Abdul Hamed; a.k.a. AL-SABAII, Anas), Afghanistan (DOB 30 Mar 1964, Alt. DOB 14 May 1964; POB Tripoli, Libya; citizen Libya) (individual) [SDGT]

AL-MUGHASSIL, Ahmad Ibrahim (a.k.a. ABU OMRAN; a.k.a. AL-MUGHASSIL, Ahmed Ibrahim) (DOB 26 Jun 1967; POB Qatif-Bab al Shamal, Saudi Arabia; citizen Saudi Arabia) (individual) [SDGT]

AL-NASSER, Abdelkarim Hussein Mohamed (POB Al Ihsa, Saudi Arabia; citizen Saudi Arabia) (individual) [SDGT]

AL-NUR HONEY PRESS SHOPS (a.k.a. AL-NUR HONEY CENTER), Sanaa, Yemen. [SDGT]

AL-QADI, Yasin (a.k.a. KADI, Shaykh Yassin Abdullah; a.k.a. KAHDI, Yasin), Jeddah, Saudi Arabia (individual) [SDGT]

AL-SHARIF, Sa'd (DOB 1969; POB Saudi Arabia) (individual) [SDGT]

AL-SHIFA' HONEY PRESS FOR INDUSTRY AND COMMERCE, Al-Nasr Street, Doha, Qatar; By the Shrine Next to the Gas Station, Jamal Street, Ta'iz, Yemen; Al-'Arudh Square, Khur Maksar, Aden, Yemen; P.O. Box 8089, Al-Hasabah, Sanaa, Yemen [SDGT]

AL-YACOUB, Ibrahim Salih Mohammed (DOB 16 Oct 1966; POB Tarut, Saudi Arabia; citizen Saudi Arabia) (individual) [SDGT]

ALI, Ahmed Mohammed Hamed (a.k.a. ABDUREHMAN, Ahmed Mohammed; a.k.a. ABU FATIMA; a.k.a. ABU ISLAM; a.k.a. ABU KHADIIJAH; a.k.a. AHMED HAMED; a.k.a. Ahmed The Egyptian; a.k.a. AHMED, Ahmed; a.k.a. AL-MASRI, Ahmad; a.k.a. AL-SURIR, Abu Islam; a.k.a. ALI, Ahmed Mohammed; a.k.a. ALI, Hamed; a.k.a. HEMED, Ahmed; a.k.a. SHIEB, Ahmed; a.k.a. SHUAIB), Afghanistan (DOB 1965; POB Egypt; citizen Egypt) (individual) [SDGT]

ATWA, Ali (a.k.a. BOUSLIM, Ammar Mansour; a.k.a. SALIM, Hassan Rostom), Lebanon (DOB 1960; POB Lebanon; citizen Lebanon) (individual) [SDGT1]

ATWAH, Muhsin Musa Matwalli (a.k.a. ABDEL RAHMAN; a.k.a. ABDUL RAHMAN; a.k.a. AL-MUHAJIR, Abdul Rahman; a.k.a. AL-NAMER, Mohammed K.A.), Afghanistan (DOB 19 Jun 1964; POB Egypt; citizen Egypt) (individual) [SDGT]

BIN MARWAN, Bilal (DOB 1947) (individual) [SDGT]

BIN MUHAMMAD, Ayadi Chafiq (a.k.a. AIADI, Ben Muhammad; a.k.a. AIADY, Ben Muhammad; a.k.a. AYADI CHAFIK, Ben Muhammad; a.k.a. AYADI SHAFIQ, Ben Muhammad), Darwingasse 1/2/58-60, Vienna, Austria; 28 Chaussee de Lille, Mouscron, Belgium; 129 Park Road, NW8, London, England; Helene Meyer Ring 10-1415-80809, Munich, Germany; Tunisia (DOB 21 Jan 1963; POB Safais (Sfax), Tunisia) (individual) [SDGT]

DARKAZANLI, Mamoun, Uhlenhorsterweg 34 11, 22085, Hamburg, Germany (DOB 4 Aug 1958; POB Aleppo, Syria; Passport No: 1310636262 <Germany>) (individual) [SDGT]

EL-HOORIE, Ali Saed Bin Ali (a.k.a. AL-HOURI, Ali Saed Bin Ali; a.k.a. EL-HOURI, Ali Saed Bin Ali) (DOB 10 Jul 1965, alt. DOB 11 Jul 1965; POB El Dibabiya, Saudi Arabia; citizen Saudi Arabia) (individual) [SDGT]

FADHIL, Mustafa Mohamed (a.k.a. AL MASRI, Abd Al Wakil; a.k.a. AL-NUBI, Abu; a.k.a. ALI, Hassan; a.k.a. ANIS, Abu; a.k.a. ELBISHY, Moustafa Ali; a.k.a. FADIL, Mustafa Muhamad; a.k.a. FAZUL, Mustafa; a.k.a. HUSSEIN; a.k.a. JIHAD, Abu; a.k.a. KHALID; a.k.a. MAN, Nu; a.k.a. MOHAMMED, Mustafa; a.k.a. YUSSRR, Abu) (DOB 23 Jun 1976; POB Cairo, Egypt; citizen Egypt, alt. citizen Kenya; Kenyan ID No. 12773667; Serial No. 201735161) (individual) [SDGT]

GHAILANI, Ahmed Khalfan (a.k.a. "AHMED THE TANZANIAN"; a.k.a. "FOOPIE"; a.k.a. "FUPI"; a.k.a. AHMAD, Abu Bakr; a.k.a. AHMED, A.; a.k.a. AHMED, Abubakar; a.k.a. AHMED, Abubakar K.; a.k.a. AHMED, Abubakar Khalfan; a.k.a. AHMED, Abubakary K.; a.k.a. AHMED, Ahmed Khalfan; a.k.a. AL TANZANI, Ahmad; a.k.a. ALI, Ahmed Khalfan; a.k.a. BAKR, Abu; a.k.a. GHAILANI, Abubakary Khalfan Ahmed; a.k.a. GHAILANI, Ahmed; a.k.a. GHILANI, Ahmad Khalafan; a.k.a. HUSSEIN, Mahafudh Abubakar Ahmed Abdallah; a.k.a. KHABAR, Abu; a.k.a. KHALFAN, Ahmed; a.k.a. MOHAMMED, Shariff Omar) (DOB 14 Mar 1974, alt. DOB 13 Apr 1974, alt. DOB 14 Apr 1974, alt. DOB 1 Aug 1970; POB Zanzibar, Tanzania; citizen Tanzania) (individual) [SDGT]

HIJAZI, Riad (a.k.a. AL-AMRIKI, Abu-Ahmad; a.k.a. AL-HAWEN, Abu-Ahmad; a.k.a. AL-MAGHRIBI, Rashid; a.k.a. AL-SHAHID, Abu-Ahmad; a.k.a. HIJAZI, Raed M), Jordan (DOB 1968; POB California, U.S.A.; SSN: 548-91-5411 <U.S.A.>) (individual) [SDGT]

IZZ-AL-DIN, Hasan (a.k.a. GARBAYA, AHMED; a.k.a. SA-ID; a.k.a. SALWWAN, Samir), Lebanon (DOB 1963; POB Lebanon; citizen Lebanon) (individual) [SDGT1]

JAISH-I-MOHAMMED (a.k.a. ARMY OF MOHAMMED), Pakistan [SDGT]

JAM'YAH TA'AWUN AL-ISLAMIA (a.k.a. JAM'IYAT AL TA'AWUN AL ISLAMIYYA; a.k.a. JIT; a.k.a. SOCIETY OF ISLAMIC COOPERATION), Qandahar City, Afghanistan [SDGT]

LADEHYANOY, Mufti Rashid Ahmad (a.k.a. AHMAD, Mufti Rasheed; a.k.a. LUDHIANVI, Mufti Rashid Ahmad; a.k.a. WADEHYANOY, Mufti Rashid Ahmad), Karachi, Pakistan (individual) [SDGT]

MOHAMMED, Fazul Abdullah (a.k.a. ABDALLA, Fazul; a.k.a. ADBALLAH, Fazul; a.k.a. AISHA, Abu; a.k.a. AL SUDANI, Abu Seif; a.k.a. ALI, Fadel Abdallah Mohammed; a.k.a. FAZUL, Abdalla; a.k.a. FAZUL, Abdallah; a.k.a. FAZUL, Abdallah Mohammed; a.k.a. FAZUL, Haroon; a.k.a. FAZUL, Harun; a.k.a. HAROON; a.k.a. HAROUN, Fadhil; a.k.a. HARUN; a.k.a. LUQMAN, Abu; a.k.a. MOHAMMED, Fazul; a.k.a. MOHAMMED, Fazul Abdilahi; a.k.a. MOHAMMED, Fouad; a.k.a. MUHAMAD, Fadil Abdallah) (DOB 25 Aug 1972, alt. DOB 25 Dec 1974, alt. DOB 25 Feb 1974; POB Moroni, Comoros Islands; citizen Comoros, alt. citizen Kenya) (individual) [SDGT]

MOHAMMED, Khalid Shaikh (a.k.a. ALI, Salem; a.k.a. BIN KHALID, Fahd Bin Abdallah; a.k.a. HENIN, Ashraf Refaat Nabith; a.k.a. WADOOD, Khalid Abdul) (DOB 14 Apr 1965, alt. DOB 1 Mar 1964; POB Kuwait; citizen Kuwait) (individual) [SDGT]

MSALAM, Fahid Mohammed Ally (a.k.a. AL-KINI, Usama; a.k.a. ALLY, Fahid Mohammed; a.k.a. MSALAM, Fahad Ally; a.k.a. MSALAM, Fahid Mohammed Ali; a.k.a. MSALAM, Mohammed Ally; a.k.a. MUSALAAM, Fahid Mohammed Ali; a.k.a. SALEEM, Fahid Muhamad Ali) (DOB 19 Feb 1976; POB Mombasa, Kenya; citizen Kenya) (individual) [SDGT]

RABITA TRUST, Room 9A, 2nd Floor, Wahdat Road, Education Town, Lahore, Pakistan; Wares Colony, Lahore, Pakistan [SDGT]

SWEDAN, Sheikh Ahmed Salim (a.k.a. Ahmed the Tall; a.k.a. ALLY, Ahmed; a.k.a. BAHAMAD; a.k.a. BAHAMAD, Sheik; a.k.a. BAHAMADI, Sheikh; a.k.a. SUWEIDAN, Sheikh Ahmad Salem; a.k.a. SWEDAN, Sheikh; a.k.a. SWEDAN, Sheikh Ahmed Salem) (DOB 9 Apr 1969, alt. DOB 9 Apr 1960; POB Mombasa, Kenya; citizen Kenya) (individual) [SDGT]

UTHMAN, Omar Mahmoud (a.k.a. ABU ISMAIL; a.k.a. ABU UMAR, Abu Omar; a.k.a. AL-FILISTINI, Abu Qatada; a.k.a. TAKFIRI, Abu 'Umr; a.k.a. UMAR, Abu Umar; a.k.a. UTHMAN, Al-Samman; a.k.a. UTHMAN, Umar), London, England (DOB 30 Dec 1960, alt. DOB 13 Dec 1960) (individual) [SDGT]

YASIN, Abdul Rahman (a.k.a. TAHIA, Abdul Rahman S.; a.k.a. TAHER, Abdul Rahman S.; a.k.a. YASIN, Abdul Rahman Said; a.k.a. YASIN, Aboud) (DOB 10 Apr 1960; POB Bloomington, Indiana U.S.A.; SSN 156-92-9858 <U.S.A.>; Passport No. 27082171 <U.S.A. - issued 21 Jun 1992 in Amman, Jordan>, alt. Passport No. M0887925 <Iraq>; citizen U.S.A.) (individual) [SDGT]

YULDASHEV, Tohir (a.k.a. YULDASHEV, Takhir), Uzbekistan (individual) [SDGT]

ZIA, Mohammad (a.k.a. ZIA, Ahmad), c/o Ahmed Shah s/o Painda Mohammad al-Karim Set, Peshawar, Pakistan; c/o Alam General Store Shop 17, Awami Market, Peshawar, Pakistan; c/o Zahir Shah s/o Murad Khan Ander Sher, Peshawar, Pakistan (individual) [SDGT]

MUGHNIYAH, Imad Fa'iz (a.k.a. MUGHNIYAH, Imad Fayiz), Senior Intelligence Officer of HIZBALLAH (DOB 07 Dec 1962, POB Tayr Dibba, Lebanon, Passport No. 432298 <Lebanon>) (individual) [SDT] (Already on SDN List)

## **EXHIBIT D**

19/10/2001



## Press Release SC/7180

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### **SECURITY COUNCIL COMMITTEE CONCERNING AFGHANISTAN ISSUES A FURTHER ADDENDUM**

(Reissued as received.)

The following is a further addendum of entities and/or persons that have so far been identified by the Committee pursuant to paragraph 8 (c) of resolution 1333 (2000). It should be noted that this is the third addendum to the consolidated list dated 8 March 2001 (AFG/131-SC/7028), as amended on 20 August 2001 (AFG/142-SC/7124), and further amended on 8 October 2001 (AFG/150-SC/7166).

In this connection, the attention of Member States is drawn to paragraph 8 (c) of Security Council resolution 1333 (2000) which stipulates that all States shall take further measures to freeze without delay funds and other financial assets of Usama bin Laden and individuals and entities associated with him as designated by the Committee, including those in the Al-Qaida organization, and including funds derived or generated from property owned or controlled directly or indirectly by Usama bin Laden and individuals and entities associated with him, and to ensure that neither they nor any other funds or financial resources are made available, by their nationals or by any persons within their territory, directly or indirectly for the benefit of Usama bin Laden, his associates, or any entities owned or controlled, directly or indirectly, by Usama bin Laden or individuals and entities associated with him including the Al-Qaida organization.

The Committee will continue to maintain an updated list, based on information provided by States and regional organizations, of the individuals and entities designated as being associated with Usama bin Laden, including those in the Al-Qaida organization.

#### **Entities:**

**Al-Hamati Sweets Bakeries**, Al-Mukallah, Hadhramawt Governorate, Yemen.

**Al-Nur Honey Press Shops** (A.K.A. Al-Nur Honey Center), Sanaa, Yemen.

**Al-Shifa, Honey Press For Industry And Commerce**, P.O. Box 8089, Al-Hasabah, Sanaa, Yemen; By The Shrine Next To The Gas Station, Jamal Street, Ta'iz, Yemen; Al- Arudh Square, Khur Maksar, Aden, Yemen; Al-Nasr Street, Doha, Qatar.

**Jaish-I-Mohammed**(A.K.A. Army of Mohammed), Pakistan.

**Jam'yah Ta'awun Al-Islamia** (A.K.A. Society of Islamic Cooperation) (A.K.A. Jam'iyyat Al Ta'awun Al Islamiyya) (A.K.A. Jit), Qandahar City, Afghanistan.

**Rabita Trust**, Room 9a, 2nd Floor, Wahdat Road, Education Town, Lahore, Pakistan; Wares Colony, Lahore, Pakistan.

**Individuals:**

**Agha, Haji Abdul Manan** (A.K.A. Saiyid, Abd Al-Man, Am) Pakistan.

**Al-Hamati, Muhammad** (A.K.A. Al-Ahdal, Mohammad Hamdi Sadiq; A.K.A. Al-Makki, Abu Asim), Yemen.

\* **Al-Haq, Amin** (A.K.A. Amin, Muhammad; A.K.A. Ah Haq, Dr. Amin; Ul-Haq, Dr. Amin); DOB: 1960; POB: Nangahar Province, Afghanistan.

\* **Al-Jadawi, Saqar**; DOB: 1965.

\* **Al-Kadr, Ahmad Sa'id** (A.K.A. Al-Kanadi, Abu Abd Al-Rahman); DOB: 01 March 1948; POB: Cairo, Egypt.

**Al-Qadi, Yasin** (A.K.A. Kadi, Shaykh Yassin Abdullah; A.K.A. Kahdi, Yasin), Jeddah, Saudi Arabia.

\* **Al-Sharif, Sa'd**; DOB: 1969; POB: Saudi Arabia.

\* **Bin Marwan, Bilal**; DOB: 1947.

**Bin Muhammad, Ayadi Chafiq** (A.K.A. Ayadi Shafiq, Ben Muhammad; A.K.A. Ayadi Chafik, Ben Muhammad; A.K.A. Aiadi, Ben Muhammad; A.K.A. Aiady, Ben Muhammad), Helene Meyer Ring 10-1415-80809, Munich, Germany; 129 Park Road, NW8, London, England; 28 Chausse Di Lille, Moscron, Belgium; Darvingasse 1/2/58-60, Vienna, Austria; Tunisia; DOB: 21 January 1963; POB: Safais (Sfax), Tunisia.

**Darkazanli, Mamoun**; Uhlenhorster Weg 34, Hamburg, 22085 Germany; DOB: August 4, 1958; POB: Aleppo, Syria; Passport No: 1310636262 (Germany).

**Hijazi, Riad** (A.K.A. Hijazi, Raed M.; A.K.A. Al-Hawen, Abu-Ahmad; A.K.A. Al-Maghribi, Rashid (The Moroccan); A.K.A. Al-Amriki, Abu-Ahmad (The American); A.K.A. Al-Shahid, Abu-Ahmad), Jordan; DOB: 1968; POB: California, U.S.A.; SSN: 548-91-5411.

**Ladehyanoy, Mufti Rashid Ahmad** (A.K.A. Ludhianvi, Mufti Rashid Ahmad; A.K.A. Armand, Mufti Rasheed; A.K.A. Wadehyanoy, Mufti Rashid Ahmad); Karachi, Pakistan.

**Uthman, Omar Mahmoud** (A.K.A. Al-Filistini, Abu Qatada; A.K.A. Takfiri, Abu Umr; A.K.A. Abu Umar, Abu Omar; A.K.A. Uthman, Al-Samman; A.K.A. Umar, Abu Umar; A.K.A. Uthman, Umar; A.K.A. Abu Ismail), London, England; DOB: 30 December 1960 or 13 December 1960.

**Yuldashev, Tohir** (A.K.A. Yuldashev, Takhir), Uzbekistan.

**Zia, Mohammad** (A.K.A. Zia, Ahmad); C/O Ahmed Shah C/O Painda Mohammad Al-Karim Set, Peshawar, Pakistan; C/O Alam General Store Shop 17, Awami Market, Peshawar, Pakistan; C/O Zahir Shah S/

**Abdullah Ahmed Abdullah** (A.K.A. Abu Mariam; A.K.A. Al-Masri, Abu Mohamed; A.K.A. Saleh); Afghanistan; DOB: 1963; POB: Egypt; Citizen Egypt (Individual).

**Muhsin Musa Matwalli Atwah** (A.K.A. Abdel Rahman; A.K.A. Abdul Rahman; A.K.A. Al-Muhajir, Abdul Rahman; A.K.A. Al-Namer, Mohammed K.A.), Afghanistan; DOB: 19 Jun 1964; POB: Egypt; Citizen Egypt (Individual).

**Anas Al-Liby** (A.K.A. Al-Libi, Anas; A.K.A. Al-Raghie, Nazih; A.K.A. Al-Raghie, Nazih Abdul Hamed; A.K.A. Al-Sabai, Anas), Afghanistan; DOB: 30 Mar 1964; Alt. DOB: 14 May 1964; POB: Tripoli, Libya; Citizen Libya (Individual).

**Ahmed Khalfan Ghailani** (A.K.A. "Ahmed The Tanzanian"; A.K.A. "Foopie"; A.K.A. "Fupi"; A.K.A. Ahmad, Abu Bakr; A.K.A. Ahmed, A; A.K.A. Ahmed, Abubakar; A.K.A. Ahmed, Abubakar K.; A.K.A. Ahmed, Abubakar Khalfan; A.K.A. Ahmed, Abubakary K.; A.K.A. Ahmed, Ahmed Khalfan; A.K.A. Al Tanzani, Ahmad; A.K.A. Ali, Ahmed Khalfan; A.K.A. Bakr, Abu; A.K.A. Ghailani, Abubakary Khalfan Ahmed, A.K.A. Ghailani, Ahmed; A.K.A. Ghilani, Ahmad Khalafan; A.K.A. Hussein, Mahafudh Abubakar Ahmed Abdallah; A.K.A. Khabar, Abu; A.K.A. Khalfan, Ahmed; A.K.A. Mohammed, Shariff Omar); DOB: 14 Mar 1974; Alt. DOB: 13 Apr. 1974; Alt. DOB: 14 Apr. 1974; Alt. DOB: 1 Aug. 1970; POB: Zanzibar, Tanzania; Citizen Tanzania (Individual).

**Ahmed Mohammed Hamed Ali** (A.K.A. Abdurehman, Ahmed Mohammed; A.K.A. Abu Fatima; A.K.A. Abu Islam; A.K.A. Abu Khadijah; A.K.A. Ahmed Hamed; A.K.A. Ahmed The Egyptian; A.K.A. Ahmed, Ahmed; A.K.A. Al-Masri, Ahmad; A.K.A. Al-Surir, Abu Islam; A.K.A. Ali, Ahmed Mohammed; A.K.A. Ali, Hamed; A.K.A. Hemed, Ahmed; A.K.A. Shieb, Ahmed; A.K.A. Shuaib); Afghanistan; DOB: 1965; POB: Egypt; Citizen Egypt (Individual).

**Fazul Abdullah Mohammed** (A.K.A. Abdalla, Fazul; A.K.A. Adballah, Fazul; A.K.A. Aisha, Abu; A.K.A. Al Sudani, Abu Seif; A.K.A. Ali, Fadel Abdallah Mohammed; A.K.A. Fazul, Abdalla; A.K.A. Fazul, Abdallah; A.K.A. Fazul, Abdallah Mohammed; A.K.A. Fazul, Haroon; A.K.A. Fazul, Harun; A.K.A. Haroon; A.K.A. Haroun, Fadhil; A.K.A. Harun; A.K.A. Luqman, Abu; A.K.A. Mohammed, Fazul; A.K.A. Mohammed, Fazul Abdilahi; A.K.A. Mohammed, Fouad; A.K.A. Muhamad, Fadil Abdallah); DOB: 25 Aug 1972; Alt. DOB: 25 Dec 1974; Alt. DOB: 25 Feb 1974; POB: Moroni, Comoros Islands; Citizen Comoros; Alt. Citizen Kenya (Individual).

**Mustafa Mohamed Fadhl** (A.K.A. Al Masri, Abd Al Wakil; A.K.A. Al-Nubi, Abu; A.K.A. Ali, Hassan; A.K.A. Anis, Abu; A.K.A. Elbisy, Moustafa Ali; A.K.A. Fadil, Mustafa Muhamad; A.K.A. Fazul, Mustafa; A.K.A. Hussein; A.K.A. Jihad, Abu; A.K.A. Khalid; A.K.A. Man, Nu; A.K.A. Mohammed, Mustafa; A.K.A. Yussrr, Abu); DOB: 23 Jun 1976; POB: Cairo, Egypt; Citizen Egypt; Alt. Citizen Kenya; Kenyan Id. No. 12773667; Serial No. 201735161 (Individual).

**Sheikh Ahmed Salim Swedan** (A.K.A. Ahmed The Tall; A.K.A. Ally, Ahmed; A.K.A. Bahamad; A.K.A. Bahamad, Sheik; A.K.A. Bahamadi, Sheikh; A.K.A. Suweidan, Sheikh Ahmad Salem; A.K.A. Swedan, Sheikh; A.K.A. Swedan, Sheikh Ahmed Salem); DOB: 9 Apr 1969; Alt. DOB: 9 Apr 1960; POB: Mombasa, Kenya; Citizen Kenya (Individual).

**Fahid Mohammed Ally Msalam** (A.K.A. Al-Kini, Usama; A.K.A. Ally, Fahid Mohammed; A.K.A. Msalam, Fahad Ally; A.K.A. Msalam, Fahid Mohammed Ali; A.K.A. Msalam, Mohammed Ally; A.K.A. Musalaam, Fahid Mohammed Ali; A.K.A. Salem, Fahid Muhamad Ali); DOB: 19 Feb 1976; POB: Mombasa, Kenya; Citizen Kenya (Individual).

**Abdul Rahman Yasin** (A.K.A. Taha, Abdul Rahman S.; A.K.A. Taher, Abdul Rahman S.; A.K.A. Yasin, Abdul Rahman Said; A.K.A. Yasin, Aboud); DOB: 10 Apr 1960; POB: Bloomington, Indiana U.S.A.; SSN 156-92-9858 (U.S.A.); Passport No. 27082171 (U.S.A. (Issued 21 Jun 1992 In Amman, Jordan)); Alt. Passport No. MO887925 (Iraq); Citizen U.S.A. (Individual).

\*The names with an asterisk have already been published in the consolidated list dated 8 March 2001 (AFG/131-SC/7028), however, due to the provision of additional information, they have been included in the current addendum.

## **EXHIBIT E**

REG'D 13 FEB 1992 10 AM PM FILED  
 STATE OF DELAWARE  
 SECRETARY OF STATE  
 DIVISION OF CORPORATIONS  
 FILED 09:00 AM 02/03/1992  
 672034004 - 2286982



**CERTIFICATE OF INCORPORATION  
A NON STOCK CORPORATION**

- FIRST: The name of this Corporation is. MUWARAQ FOUNDATION.
- SECOND: Its Registered Office in the State of Delaware is to be located at 710 Yorklyn Rd. Street, in the City of Hockessin.
- County of New Castle, Zip Code 19707. The Registered Agent in charge thereof is Registered Agents Ltd.
- THIRD: The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware. (If the corporation is to be a nonprofit corporation, please add: "This corporation shall be a nonprofit corporation.")  
This Corporation shall be a Non Profit Corporation
- FOURTH: The corporation shall not have any capital stock, and the conditions of membership shall be (In lieu of setting out the conditions of membership in the Certificate of Incorporation, a statement may be inserted that the conditions of membership shall be stated in the By-Laws.) as follows:  
The "Original Members" of the foundation Board of Directors
  - 1. Mr. Yassin A. Kadi, Chairman
  - 2. Members of the Board:  
Mr. Talal M. M. Badkook, Dr. Mohaman Ali Elgari,
  - FIFTH: The name and mailing address of the incorporator are as follows:  
 Name Mr. Yassin A. Kadi  
 Mailing Address P.O. Box 214 Jeddah 21411, Saudi Arabia.  
 Zip Code \_\_\_\_\_
- I, THE UNDERSIGNED, being the incorporator hereinbefore named, for the purpose of forming a corporation pursuant to Chapter 1 of Title 8 of the Delaware Code, do make this Certificate, hereby declaring and certifying that the facts herein stated are true, and accordingly have hereunto set my hand this

14th day of January, A.D. 19 92

Yassin Kadi

Incorporator

## **EXHIBIT F**



DEPARTMENT OF THE TREASURY  
WASHINGTON

GENERAL COUNSEL

November 29, 2001

M. Claude Nicati  
Substitut du Procureur General  
Taubenstrasse 16  
3003 Berne  
SWITZERLAND

Re: Yassin A. Kadi

Dear Mr. Nicati:

This letter is provided to you pursuant to your request under the mutual legal assistance treaty between the United States and Switzerland in connection with the action taken by the Government of Switzerland to block assets of Yassin A. Kadi (aka Qadi or Qadhi). Although some of the information concerning Mr. Kadi comes from sensitive sources that we cannot disclose, we have agreed to provide you with an unclassified summary of certain information concerning Mr. Kadi. We believe that this information is generally reliable and, taken as a whole, supports the decision to block Mr. Kadi's assets. This summary may be disclosed publicly in legal proceedings.

Based upon information available to the United States Government, we have a reasonable basis to believe that Mr. Kadi has a long history of financing and facilitating the activities of terrorists and terrorist-related organizations, often acting through seemingly legitimate charitable enterprises and businesses.

In 1991, Mr. Kadi wired \$820,000 to a business in the United States. This money was laundered through a complex land transaction in Illinois, apparently to hide any connection to Mr. Kadi and the eventual transfer of the funds to the Quranic Literacy Institute (QLI). Some of the proceeds of this transaction were used by QLI to finance the activities of Mohammed Salah (alias Abu Ahmed),<sup>1</sup> an admitted head of the military wing of the terrorist organization HAMAS.<sup>2</sup> Subsequently, Mr. Kadi wired \$27,000 directly to Mr. Salah's account in March

<sup>1</sup> Mr. Salah is a "Specially Designated Terrorist" (STD) under United States Executive Order No. 12947, 60 Fed. Reg. 5079 (1995) (E.O. 12947). See Notice of Blocking, 60 Fed. Reg. 41152 (1995).

<sup>2</sup> HAMAS has been designated a "Foreign Terrorist Organization" pursuant to the Anti-Terrorism and Effective Death Penalty Act of 1996, Pub. L. 104-132, 110 Stat. 1214 (1996) and an SDT under E.O. 12947, see 31 C.F.R. Ch V, App. A, and a "Specially Designated Global Terrorist" (SDGT) under United States Executive Order No. 13224, 66 Fed. Reg. 49079 (2001) (E.O. 13224).

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1992. This wire, from Faisal Finance account number IFA 10004, came directly from an account that is the subject of the Swiss sequestration order covering Mr. Kadi's accounts. There were additional wires from Faisal Finance to Mr. Salah's account, but our information on those transfers is still incomplete. Similarly, we are still investigating other Faisal Finance transfers, one for \$200,000 and another for \$665,000, all or a substantial portion of which were sent to Mr. Salah through an account controlled by another HAMAS operative, Abu Marzook.<sup>3</sup>

At the direction of Abu Marzook, Mr. Salah distributed tens of thousands of dollars, and perhaps more, to HAMAS cells in and around Israel. Mr. Salah was arrested in Israel in 1993 carrying nearly \$100,000 in cash and extensive notes of his meetings with HAMAS operatives during the days preceding his arrest. Analysis of the monetary transfers involved in the Illinois land transaction, and of wires into Mr. Salah's accounts prior to leaving for Israel, show a close connection between the funds involved in the transactions and those distributed by Mr. Salah to terrorist cells.<sup>4</sup>

In recent press interviews, Mr. Kadi has denied any wrongdoing in connection with these money transfers. He says that the loan on the Illinois property was intended to help the QLI "open a peaceful dialogue between nations," but he has neither explained the convoluted nature of the transaction nor made any claim for repayment of the "loan." He claims not to recall ever having met Mr. Salah, although Mr. Salah's lawyer states that Mr. Salah did meet with Mr. Kadi, that Mr. Kadi befriended him, and that he gave the \$27,000 to Mr. Salah to open a bank account in Chicago.

Mr. Kadi has acknowledged in a number of press accounts that he is the founder of the Muwafaq, or "Blessed Relief," Foundation. He is identified in legal records as "Chairman" of the foundation. The leader of the terrorist organization Al-Gama'at Al-Islamiya,<sup>5</sup> Talad Fuad Kassem, has said that the Muwafaq Foundation provided logistical and financial support for a mujahadin battalion in Bosnia. The foundation also operated in Sudan, Somalia and Pakistan, among other places.

A number of individuals employed by or otherwise associated with the Muwafaq Foundation have connections to various terrorist organizations. Muhammad Ali Harrath, main activist of the Tunisian Islamic Front (TIF) in the United Kingdom, was associated with Muwafaq personnel in Bosnia and other TIF members worked at the Muwafaq Foundation. Syrian citizen Mahmoud Mehdi, once a director of the Muwafaq Foundation in Pakistan, was a member of Al-Qa'ida and the Al-Faran terrorist group<sup>6</sup> responsible for the kidnapping of

<sup>3</sup> Mr. Marzook has been designated a SDT under E.O. 12947. See 31 C.F.R. Ch. V, App. A.

<sup>4</sup> A detailed account of Mr. Salah's activities, which included the recruitment and funding of HAMAS terrorists, can be found in the affidavit of FBI Special Agent Robert Wright (previously provided to you) and in *In re Extradition of Marzook*, 924 F. Supp. 565, 587-92 (S.D.N.Y. 1996).

<sup>5</sup> Al-Gama'at Al-Islamiya has been designated a "Foreign Terrorist Organization" pursuant to the Anti-Terrorism and Effective Death Penalty Act of 1996. See 31 C.F.R. Ch. V, App. A.

<sup>6</sup> Al-Faran is a "Specially Designated Global Terrorist Entity" under E.O. 13224.

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Westerners in Kashmir. He was also close to Ramzi Yusif who has been convicted in the United States for his role in the first World Trade Center attack. Following the arrest of Ramzi Yusif in 1995, the Pakistani police reportedly raided Muwafaq's offices and held its local director in custody for several months. The Muwafaq Foundation also provided support to HAMAS and the Abu Sayyaf Organization<sup>7</sup> in the Philippines.

The Muwafaq Foundation also employed or served as cover for Islamic extremists connected with the military activities of Maktab Al-Khidamat (MK),<sup>8</sup> which has been partially financed by the Muwafaq Foundation. The Muwafaq Foundation supplied identity cards and employment as cover for some Arabs to allow them to obtain visas to remain in Pakistan. The founder of MK was Abdallah Azzam, who was Usama bin Laden's mentor. Following the dissolution of MK in early June 2001 and its absorption into Al-Qa'ida, a number of NGOs formerly associated with MK, including Muwafaq, also merged with Al-Qa'ida.

Mr. Kadi has asserted in various press interviews that the Muwafaq Foundation ceased operations at a range of different times in 1995, 1996 or 1997. However, the United Nations reported that Muwafaq was active in Sudan as late as 1997. Moreover, far from ceasing operations, the U.N. report stated that the "Muwafaq Foundation plans to *continue to expand* its humanitarian activities in the coming year . . ." U.N. Department of Humanitarian Affairs, *Consolidated Inter-Agency Appeal for Sudan January-December 1997* (Feb. 18, 1997)(emphasis added).

From 1993, the head of the European offices of the Muwafaq Foundation was Ayadi Chafiq Bin Muhammad, who has been identified as Mr. Kadi's closest associate.<sup>9</sup> Ayadi Chafiq fought in Afghanistan in the 1980s and is known to be associated with the Tunisian Islamic Front (TIF) in Algeria and Nabil Ben Mohammad Salah Maklouf, its leader. Mr. Chafiq was expelled from Tunisia because of his membership in the TIF. As of February 1999, Mr. Chafiq was running Mr. Kadi's European network and serving as the president of Depositna Banka in Sarajevo, Bosnia, which was owned by Mr. Kadi. Mr. Chafiq may have participated in planning an attack on a U.S. facility in Saudi Arabia. Mr. Chafiq left his residence in London in a hurry after the September 11 attacks, and had reportedly been in the United States in the months preceding the attack.

The pattern of activity displayed by Mr. Kadi, and his foundation and businesses, is typical of the financial support network of Al Qa'ida and other terrorist organizations. Working in troubled areas such as Bosnia, Somalia, Sudan, and various refugee camps, the putative "relief" organizations provide cover for individuals engaged in recruiting, organizing, and

<sup>7</sup> The Abu Sayyaf Organization is a "Specially Designated Global Terrorist Entity" under E.O. 13224.

<sup>8</sup> MK is a "Specially Designated Global Terrorist Entity" under E.O. 13224.

<sup>9</sup> Ayadi Chafiq is a "Specially Designated Global Terrorist Individual" under E.O. 13224. See Amendment of Final Rule, 66 Fed. Reg. 54404 (2001). He also is listed as one of the signatories on Swiss accounts at Faisal Financial with Kadi.

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training terrorist cells. Their provision of humanitarian aid and educational services is done in concert with the terrorists to win the hearts and minds of the local people to whatever causes the terrorists espouse. When a region becomes more settled, such as Bosnia or Albania today, seemingly legitimate businesses replace charitable foundations as cover for continuing terrorist organizational activity. Mr. Kadi's actions and those of his Muwafaq Foundation and businesses fit this pattern and give rise to a reasonable basis to believe that they have facilitated terrorist activities.

As noted previously, this is a summary of information concerning Mr. Kadi that we can release at this time. If we are able to release additional information in the future we will let you know.

Sincerely,



David D. Aufhauser  
General Counsel